

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER

FOURTH AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Lori G. Cohen, Esq.,
GREENBERG TRAURIG, LLP
Terminus 200, 3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305**
*Attorneys for Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical
Industries, Ltd., Actavis, LLC, Arrow Pharm Malta Ltd., and Actavis Pharma (hereinafter
“Defendants”).*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of **Jens Nassall**, on June 30, 2021 at 6:00 a.m. eastern time, and continuing until completion, via remote deposition while the witness is at her home or office or other location agreed to by the parties, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least 5 days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

TAKING ATTORNEYS FOR PLAINTIFFS:

David J. Stanoch, Esq.
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d.stanoch@kanner-law.com

The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

June 17, 2021

PLAINTIFFS' CO-LEAD COUNSEL

By: /s/ David J. Stanoch
DAVID J. STANOCH
Kanner & Whiteley, L.L.C.
701 Camp St.
New Orleans, LA 70130
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EXHIBIT A

RULE 30(B)(6) TOPICS (*see* ECF 651-1 for full list of Topics to Teva)

44. Teva's oral and written communications with ZHP with regard to the content/purity/contamination of ZHP's valsartan API.
45. Teva's oral and written communications with Mylan with regard to the content/purity/contamination of Mylan's valsartan API.
46. Teva's oral and written communications with its valsartan finished dose customers or other downstream entities (i.e., wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues, for example carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, related to the Teva finished dose.
47. Teva's oral and written communications (defined to include representations and warranties) to finished dose manufacturers, wholesalers, retailers, and consumers with regard to the contents and purity of Teva's finished dose.
48. Teva's product recall for valsartan finished dose, including who Teva communicated with, how, about what, and the retention of recalled or sequestered valsartan finished dose.
49. All credits, indemnification, refunds, and/or penalties paid or provided by or to Teva in connection with the nitrosamine contamination of valsartan.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Jens Nassall.
2. The complete production of Jens Nassall's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2021, I caused the foregoing document to be electronically filed with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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